

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**ACKERMAN MCQUEEN, INC.**

**Plaintiff,**

**v.**

**GRANT STINCHFIELD,**

**Defendant.**

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**CIVIL ACTION NO. 3:19-CV-03016-X**

**DEFENDANT’S RESPONSE TO PLAINTIFF’S MOTION TO COMPEL**

Defendant Grant Stinchfield (“Stinchfield”) hereby files, through the undersigned counsel, the instant response to Plaintiff’s Motion to Compel. Accompanying this Motion is a supporting brief. In the supporting brief, Stinchfield sets forth AMc’s disregard of the work product doctrine. In addition, the supporting brief sets forth that AMc has not met its burden to compel the documents it seeks.

WHEREFORE, for good cause shown in the submissions filed with the Court, Stinchfield request the following relief:

1. An order denying Plaintiff’s motion to compel; and
2. An order awarding Defendant his reasonable attorneys’ fees and costs for the reasons set forth in the brief pursuant to Fed. R. Civ. P. 37(a)(5).

October 13, 2020

Respectfully submitted,

**BREWER STOREFRONT, PLLC**

By: /s/ Ian Shaw

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was electronically served via the Court's electronic case filing system upon all counsel of record on this 13th day of October 2020.

/s/ Ian Shaw  
Ian Shaw